

**Lory R. Lybeck**  
Lybeck Murphy, LLP  
7525 SE 24<sup>th</sup> Street, Ste. 500  
Mercer Island, WA 98040-2334  
206-230-4255 /phone  
206-230-7791 /fax  
Lybeck – [lrl@lybeckmurphy.com](mailto:lrl@lybeckmurphy.com)  
**Lybeck – OSB #83276**  
Attorney for defendant

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON AT PORTLAND

Atlantic Recording Corporation, a	)	No. CV 05-933 AS
Delaware corporation; Priority Records,	)	
LLC, a California limited liability	)	Motion for Entry of Judgment for
company; Capitol Records, Inc., a	)	Attorney's Fees, Costs, and Interest
Delaware corporation; UMG Recordings,	)	
Inc., a Delaware corporation; and BMG	)	
Music, a New York general partnership,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
Tanya Andersen,	)	
	)	
Defendant.	)	

**MOTION**

Defendant Tanya Andersen respectfully moves this court for entry of judgment representing the attorney's fees and costs previously awarded by this court, together with statutory interest pursuant to 28 U.S.C. § 1961. In support of the motion defendant relies on the prior orders of this court.

On January 16<sup>th</sup>, 2008 this court granted Ms. Andersen's Motion for Attorney's Fees. On June 24<sup>th</sup>, 2008, this court granted in part and denied in part Ms. Andersen's Motion to Fix Amount

of Attorney's Fees, awarding Ms. Andersen attorney's fees in the amount of \$103,175, and approving her Bill of Costs in the amount of \$4,659.

Ms. Andersen requests that judgment be entered for attorney's fees, costs, and interest against plaintiffs as follows:

1. Attorney's Fees: \$ 103,175.00
2. Costs: \$ 4,659.00
3. Total Fees and Costs: **\$ 107,834.00**
4. Post Judgment Interest: Interest shall accrue on the award of \$107,834.00 at the statutory rate of 2.46% per annum from the date of entry of this judgment until paid in full.

The entry of this judgment should in no way affect the proceedings pending in this court in the matter of Andersen v. Atlantic, et al., Case No. CV 07-934-BR.

A proposed form of judgment is attached hereto.

Respectfully submitted this 1<sup>st</sup> day of July, 2008.

Lybeck Murphy, LLP

By: /s/ Benjamin R. Justus  
Lory R. Lybeck (OSB #83276)  
Benjamin R. Justus, admitted *pro hac vice*  
Attorneys for defendant

1                                   **IN THE UNITED STATES DISTRICT COURT**  
2                                   **FOR THE DISTRICT OF OREGON**

3                                   AFFIDAVIT OF SERVICE

4   State of Washington   )  
                                  ) ss.  
5   County of King       )

6           I hereby certify and declare that on the 1st day of July, 2008, I electronically filed the foregoing  
7   Motion for Entry of Judgment for Attorney's Fees, Costs, and Interest with the Clerk of the Court using  
8   the CM/ECF system, which will send notification of such filing to the following:

8           **Attorneys for Plaintiffs:**

9   Kenneth R. Davis, II  
10   [davisk@lanepowell.com](mailto:davisk@lanepowell.com)

11   William T. Patton  
12   [pattonw@lanepowell.com](mailto:pattonw@lanepowell.com)

13   Lane Powell PC  
601 SW Second Avenue, Suite 2100  
Portland, OR 97204  
503-778-2100/phone  
503-778-2200/fax

14   Tim Reynolds, *Admitted Pro Hac Vice*  
15   [timothy.reynolds@hro.com](mailto:timothy.reynolds@hro.com)

16   James Ruh, *Admitted Pro Hac Vice*  
17   [james.ruh@hro.com](mailto:james.ruh@hro.com)

18   Amy Bauer, *Admitted Pro Hac Vice*  
19   [amy.bauer@hro.com](mailto:amy.bauer@hro.com)

20   HOLME, ROBERTS & OWEN LLP  
1700 Lincoln Street, Ste. 4100  
Denver, CO 80203  
Telephone: (303) 861-7000  
Facsimile: (303) 866-0200

21           All parties are registered as CM/ECF participants for electronic notification.

22           DATED at Mercer Island, Washington, this 1st day of July, 2008.

23                                   By:          /s/ Lory R. Lybeck           
24                                   Lory R. Lybeck (OSB #83276)  
25                                   Attorneys for defendant  
26                                   Lybeck Murphy, LLP  
7525 SE 24<sup>th</sup> Street, Ste. 500  
Mercer Island, WA 98040  
(206) 230-4255 /phone  
(206) 230-7791 /fax  
[lrly@lybeckmurphy.com](mailto:lrly@lybeckmurphy.com)